

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

Lori Saroya,

Case No.: 24-cv-110 (DWF/DTS)

Plaintiff,

v.

**PLAINTIFF LORI SAROYA’S  
MOTION TO COMPEL**

CAIR Foundation, Inc. d/b/a Council on  
American-Islamic Relations & CAIR,

Defendant.

---

Plaintiff Lori Saroya (“Saroya”), by and through her undersigned counsel, and for the reasons stated in the supporting Memorandum filed herewith, respectfully moves the Court, pursuant to Rules 26, 33, 34 and 37 of the Federal rules of Civil Procedure, for an Order compelling Defendant CAIR Foundation, Inc. to produce documents responsive to Plaintiff’s Document Request Nos. 1-4, 8, 10-16, 18-25 and 32-41, and to provide full responses to Plaintiff’s Interrogatory Nos. 4 and 10-19.

This Motion is based on (i) the Notice of Hearing on Plaintiff Lori Saroya’s Motion to Compel; (ii) Plaintiff Lori Saroya’s Memorandum in Support of Motion to Compel; (iii) the Declaration of Steven C. Kerbaugh in Support of Plaintiff Lori Saroya’s Motion to Compel; (iv) the Meet and Confer Statement of Steven C. Kerbaugh; (v) all the files and records herein; and (vi) such other evidence and argument as may be presented to the Court before or at the time of the hearing.

*[Signature Block on Following Page]*

Dated: July 26, 2024

**SAUL EWING LLP**

By: s/ Steven C. Kerbaugh  
Steven C. Kerbaugh (MN #0390429)  
33 S. 6th St., Suite 4750  
Minneapolis, MN 55402  
(612) 225-2946  
steve.kerbaugh@saul.com

Jefferey S. Robbins  
(admitted pro hac vice)  
Joseph D. Lipchitz  
(admitted pro hac vice)  
Kelsey M. Westrich  
(admitted pro hac vice)  
131 Dartmouth Street, Suite 501  
Boston, MA 02116

***Attorneys for Plaintiff Lori Saroya***